

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF CARVER

FIRST JUDICIAL DISTRICT  
PROBATE DIVISION

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In the Matter of:

Court File No. 10-PR-16-46  
Judge Kevin W. EideEstate of Prince Rogers Nelson,  
  
Decedent.

**MEMORANDUM IN SUPPORT OF  
COMERICA BANK & TRUST, N.A.'S  
MOTION TO FILE UNDER SEAL  
UNREDACTED VERSION OF THE REPLY  
IN SUPPORT OF MOTION REGARDING  
ESTATE CASH RESERVE, FOR  
CONSIDERATION OF A DISTRIBUTION  
PLAN, AND TO SET A PROCESS FOR A  
PETITION TO APPROVE A FINAL  
ACCOUNTING AND DISCHARGE**

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Comerica Bank & Trust, N.A., as the Personal Representative of the Estate (“Estate”) of Prince Rogers Nelson (the “Personal Representative”), submits this Memorandum in Support of its Motion to File under Seal the following document:

*Unredacted Version of Comerica Bank & Trust, N.A.'S Reply In Support Of Motion Regarding Estate Cash Reserve, for Consideration of a Distribution Plan, and to Set a Process for Petition to Approve a Final Accounting and Discharge*

This document contains confidential financial information regarding the Estate and its assets. This request to seal this documents is supported by the need to maintain the confidentiality of the Estate’s financial information. The redacted information qualifies as confidential commercial information under Minn. R. Civ. P. 26.03(a)(7), and there is no historical right of access to the information under the test articulated in *Minneapolis Star & Tribune Co. v. Schumacher*, 392 N.W.2d 197 (Minn. 1986). Revealing the unredacted contents of this document could adversely impact the ongoing administration of the Estate. Pursuant to

the Court's January 19, 2017 Order, the Personal Representative is filing a publicly redacted copy of the Reply, while filing as confidential the unredacted version of the Reply.

Accordingly, the Personal Representative respectfully requests that the Court permit it to file under seal the unredacted version of the Reply.

Dated: January 13, 2022

/s/ Joseph J. Cassioppi

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